

ERICK M. FERRAN, ESQ.
Nevada State Bar No. 9554
HITZKE & ASSOCIATES
3753 Howard Hughes Parkway, Ste. 200
Las Vegas, NV 89169
Telephone No.: (702) 784-7600
Facsimile No.: (702) 784-7649
ferranlawoffice@gmail.com
Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THE UNITED STATES OF AMERICA

Plaintiff,

vs.

JACLYN MIKIE SUMARNKANT

Defendants.

Case No.: 2:13-cr-00147-LDG-GWF

**UNOPPOSED MOTION TO TRAVEL
OUT OF CENTRAL DISTRICT OF
CALIFORNIA; PROPOSED ORDER**

COMES NOW, Defendant Jaclyn Mikie Sumarnkant, by and through her counsel, Erick M. Ferran, Esq., and moves the Court for an Order allowing Defendant Sumarnkant to travel from her residence to outside of the Central District of California for the purpose of attending a wedding from September 6th, 2013, until September 10th, 2013. In support of the instant unopposed motion, Defendant states the following:

Suggestions in Support:

1. On September 3, 2013, counsel for Defendant Sumarnkant contacted Assistant United States Attorney Amber Craig, Esq., in regards to this request. Ms. Craig stated that she did not have an objection to the request as long as it was acceptable to pre-trial services.

2. Ms. Sumarnkant is currently on a travel restriction which restricts her to staying within the District of Nevada and/or the Central District of California, and which only allows travel for "Court Purposes."
3. Ms. Sumarnkant is currently under the supervision of Kristianna Janich, a Pretrial Officer in California. She is similarly being supervised in Las Vegas by Pretrial Officer Zach Bowen.
4. Ms. Sumarnkant has done extremely well on pretrial release, has abided by all conditions, and has never tested positive or violated any of the conditions of her release.
5. Ms. Sumarnkant has been advised that her pretrial officer has no objection if the United States attorney and the Court approve.
6. The travel request is made so that Ms. Sumarnkant can attend her sister-in-laws wedding from September 6th through the 10th, in San Diego, California. As such, the request is made so that she may travel not out of the state, but out of the Central District into the Southern District of California. Ms. Sumarnkant will be a member of the bride's party and hopes, with the Court's approval, to be allowed to participate in her obligations as one of the bridesmaids.
7. Ms. Sumarnkant would depart from her residence in California on September 6, 2013, and drive directly to the wedding, which would be in San Diego, California. There, she would be in the presence of family members and would stay in the San Diego area until the wedding concluded on September 10th, 2013, wherein she would immediately return to her home.
8. Ms. Sumarnkant would naturally comply with any further restrictions required by Pretrial during the time of her travel.

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of HITZKE & ASSOCIATES and that on the 3rd day of September, 2013, I caused to be sent via ECF filing, a true and correct copy of the above and foregoing **UNOPPOSED MOTION TO TRAVEL OUT OF CENTRAL DISTRICT OF CALIFORNIA; PROPOSED ORDER** properly addressed to the following:

Amber Craig, Esq.
Assistant United States Attorney

/s/ Erick M. Ferran
An Employee of Hitzke & Associates

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THE UNITED STATES OF AMERICA

Plaintiff,

vs.

JACLYN MIKIE SUMARNKANT

Defendants.

Case No.: 2:13-cr-00147-LDG-GWF

~~PROPOSED~~ ORDER ALLOWING
TRAVEL

Based upon the Motion of Defendant, and good cause appearing therefore, IT IS HEREBY ORDERED that the Defendant, JACLYN MIKIE SUMARNKANT, be allowed to travel as requested. Specifically, Defendant is hereby permitted to travel from her residence in the Central District of California, to San Diego, California, on September 6, 2013. She is permitted to remain in San Diego, California, until September 10th, 2013, whereupon she is to return to her home in the Central District of California. During this time the Defendant will continue to comply with pretrial services, and will comply with any additional restrictions imposed during her period of travel.

Dated this 5 day of September, 2013.



GEORGE FOLEY, JR.
United States Magistrate Judge